

The Honorable Kymberly K. Evanson, USDJ

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

**KHUSHWINDER SINGH,**

Case No. 2:21-cv-0410-KKE

Plaintiff,

REPLY IN SUPPORT OF MOTION FOR  
LIMITED EXTENSION OF DISCOVERY  
CUTOFF

ALEDADE, INC., a Delaware Corporation.

Defendant.

## I. INTRODUCTION

Plaintiff Khushwinder Singh respectfully offers this reply in support of the motion for limited extension of the discovery cutoff in this matter for the sole purpose of conducting depositions of witnesses who have not been made available by Defendant. ECF 61.

## II. ARGUMENT IN REPLY

The present motion for a limited extension of the discovery cutoff was filed prior to the May 30, 2025 discovery cutoff date. “[R]equests for extensions of time made before the applicable deadline has passed should ‘normally ... be granted in the absence of bad faith on the part of the party seeking relief or prejudice to the adverse party.’” *Ahanchian v. Xenon Pictures*,

1 *Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010) (quoting 4B Charles Alan Wright & Arthur R. Miller,  
2 *Federal Practice & Procedure* § 1165 (3d ed. 2004)). Defendant has not, and cannot, argue  
3 either bad faith on the part of Plaintiff or prejudice to Defendant if the discovery cutoff date is  
4 extended for the limited purpose of deposing Emily Maxson, Ahmed Haque, and Sarah  
5 Chasson. Accordingly, the present request for extension should be granted.

6 **III. CONCLUSION**

7 For the foregoing reasons, Plaintiff asks the Court for a brief continuance of the  
8 discovery cutoff in this matter from May 30, 2025 to June 30, 2025 for good cause shown for  
9 the sole purpose of conducting depositions of Emily Maxson, Ahmed Haque, and Sarah  
10 Chasson. This request is reasonable and warranted under the circumstances.

11  
12 DATED this 6th day of June 2025

13  
14 By: /s Joseph D. Gehrke  
Joseph D. Gehrke, WSBA No. 47474  
15 THE SEATTLE LITIGATION GROUP, PLLC  
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17 *Attorneys for Plaintiff*

## CERTIFICATE OF SERVICE

I, the undersigned, certify under penalty of perjury of the laws of the State of Washington that I am now, and at all times herein mentioned was, a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to the above-entitled action, and am competent to testify as a witness. I am employed with Seattle Litigation Group, PLLC, 1215 4<sup>th</sup> Avenue, Suite 1100, Seattle, WA 98161. On the date stated below, I caused the foregoing *REPLY IN SUPPORT OF MOTION FOR LIMITED EXTENSION OF DISCOVERY CUTOFF* on the following

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1 DATED this 6th day of June 2025.

2 **SEATTLE LITIGATION GROUP, PLLC**

3 /s/ *Lonnie Lopez*

4 Lonnie Lopez

Paralegal